

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
CHRISTOPHER J. CAVALIER.	:	
MARGARET A. CAVALIER	:	
Debtors,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:18-bk-03303-HWV
CAB EAST, LLC/FORD MOTOR	:	
CREDIT COMPANY, LLC,	:	
Movant,	:	
	:	
CHRISTOPHER J. CAVALIER and	:	
MARGARET A. CAVALIER,	:	
Debtors	:	
	:	
And CHARLES J. DeHART III,	:	
Chapter 13 Trustee	:	
Respondents.	:	

**DEBTOR'S ANSWER TO MOVANT'S MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY AND REQUEST FOR SPECIAL RELIEF**

AND NOW COMES, Debtors, Christopher J. Cavalier and Margaret A. Cavalier, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. The Vehicle is insured.
6. Denied. Debtor has made all payments under the lease as required.
7. Denied.

8. Admitted. By way of additional response, the Lease has been extended 2 months by Ford Motor Credit to allow the Debtor to convert the Lease to a purchase.

9. Denied.

10. Admitted. See Paragraph 8 herein.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: April 29, 2020

s/Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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	:	
And CHARLES J. DeHART III,	:	
Chapter 13 Trustee	:	
Respondents.	:	

**CERTIFICATE OF SERVICE**

I, Colleen Reed, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within **Respondent's Answer to Movant's Motion For Relief From The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Howard Gershman, Esquire Gershman Law Offices, PC 610 York Road, Ste. 200 Jenkintown, PA 19046
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

s/ Colleen Reed  
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Email: creed@ljacobsonlaw.com

Dated: April 29, 2020